[Counsel Listed on Signature Page]

2

1

4

5

6

7 8

9

10

11 12

13

1415

16

17

18 19

2021

22

2324

25

2627

28

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA

SAN FRANCISCO DIVISION

IN RE: UBER TECHNOLOGIES, INC., PASSENGER SEXUAL ASSAULT LITIGATION

This Document Relates to:

ALL ACTIONS

Case No. 3:23-md-03084-CRB

JOINT LETTER REGARDING INCIDENT CATEGORIZATION AND PLAINTIFFS' WRITTEN DISCOVERY PURSUANT TO ECF 2647

Judge: Hon. Lisa J. Cisneros Courtroom: G – 15th Floor

Pursuant to the Court's March 27, 2025 Minute Entry (ECF 2647), the Parties respectfully submit this joint letter regarding disputes related to Defendants' categorization of incidents in its taxonomy and how that categorization is reflected in the data, and Plaintiffs' February 26, 2025 written discovery requests. The Parties reached agreement regarding further steps to address Defendants' categorization of incidents and how that categorization is reflected in the data, and do not presently seek the involvement of the Court. The Parties have also reached agreement on all Interrogatories except for one, and all Requests for Production except for those relating to certain deposition transcripts. The Parties are continuing to meet and confer regarding the remaining Interrogatory and Requests for Production, and if these issues are not resolved, shall file their PTO 8 letter brief(s) on April 10, 2025.

1	By: <u>/s/ Roopal Luhana</u> ROOPAL P. LUHANA (<i>Pro Hac Vice</i>)	By: <u>/s/ Michael B. Shortnacy</u> MICHAEL B. SHORTNACY (SBN: 277035)
2	CHAFFIN LUHANA LLP 600 Third Avenue, Fl. 12	mshortnacy@shb.com SHOOK, HARDY & BACON, L.L.P.
3	New York, NY 10016 Telephone: (888) 480-1123	2049 Century Park East, Suite 3000 Los Angeles, CA 90067
4	Email: luhana@chaffinluhana.com	Telephone: (424) 285-8330 Facsimile: (424) 204-9093
5	SARAH R. LONDON (SBN 267083) GIRARD SHARP LLP	PATRICK OOT (<i>Pro Hac Vice</i> admitted)
6	601 California St., Suite 1400 San Francisco, CA 94108	oot@shb.com SHOOK, HARDY & BACON, L.L.P.
7	Telephone: (415) 981-4800	1800 K Street NW, Suite 1000
8	slondon@girardsharp.com	Washington, DC 20006 Telephone: (202) 783-8400
9	RACHEL B. ABRAMS (SBN 209316) PEIFFER WOLF CARR KANE	Facsimile: (202) 783-4211
	CONWAY & WISE, LLP 555 Montgomery Street, Suite 820	RANDALL S. LUSKEY (SBN: 240915) rluskey@paulweiss.com
10	San Francisco, CA 94111 Telephone: (415) 426-5641	PAUL, WEISS, RIFKIND, WHARTON & GARRISON LLP
11	Email: rabrams@peifferwolf.com	535 Mission Street, 24th Floor San Francisco, CA 94105
12	Co-Lead Counsel for Plaintiffs	Telephone: (628) 432-5100 Facsimile: (628) 232-3101
13		ROBERT ATKINS (<i>Pro Hac Vice</i> admitted)
14		ratkins@paulweiss.com CAITLIN E. GRUSAUSKAS (<i>Pro Hac Vice</i>
15		admitted) cgrusauskas@paulweiss.com
16		ANDREA M. KELLER (<i>Pro Hac Vice</i> admitted) akeller@paulweiss.com
17		PAUL, WEISS, RIFKIND, WHARTON & GARRISON LLP
18		1285 Avenue of the Americas New York, NY 10019
19		Telephone: (212) 373-3000 Facsimile: (212) 757-3990
20		Attorneys for Defendants
21		UBER TECHNOLOGIES, INC.; RASIER, LLC; and RASIER-CA, LLC
22		RASIER, ELC, and RASIER-CA, ELC
23		
24		
25		
26		
27		
28		2

JOINT LETTER REGARDING INCIDENT CATEGORIZATION AND PLAINTIFFS' WRITTEN DISCOVERY

Case No. 3:23-MD-3084-CR2

PURSUANT TO ECF 2647

ATTESTATION Pursuant to Civil Local Rule 5-1(h)(3), I hereby attest that all signatories listed, and on whose behalf the filing is submitted, concur in the filing's consent and have authorized the filing. Dated: April 4, 2025 By: /s/ Michael B. Shortnacy

CERTIFICATE OF SERVICE

I hereby certify that on April 4, 2025, I electronically filed the foregoing document with the Clerk of the Court using the CM/ECF system, which will automatically send notification of the filing to all counsel of record.

By: /s/ Michael B. Shortnacy